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COREPHOTONICS, LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

COREPHOTONICS, LTD.

Plaintiff,

vs.

APPLE INC.

Defendant.

Case No. 3:17-cv-06457-JD (Lead)
Case No. 3:18-cv-02555-JD

**DECLARATION OF JAMES S. TSUEI IN
SUPPORT OF PLAINTIFF
COREPHOTONICS, LTD.'S REPLY
CLAIM CONSTRUCTION BRIEF**

I, James S. Tsuei, state as follows:

1. I am a member of the State Bar of California and an attorney at the firm of Russ, August & Kabat, counsel for Plaintiff Corephotonics, Ltd. in the above captioned action. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. I submit this declaration in support of Corephotonics' Reply Claim Construction Brief, filed on October 21, 2022.

3. Attached as **Exhibit 10** is a copy of the Petition for *Inter Partes* Review, IPR2020-00905, filed by Apple with the Patent Trial and Appeal Board ("PTAB") on May 6, 2020.

4. Attached as **Exhibit 11** is a copy of the PTAB Final Written Decision in IPR2020-00905, which was issued on November 8, 2021.

5. Attached as **Exhibit 12** is a copy of the public, non-confidential version of the transcript of Dr. John C. Hart's April 21, 2021 deposition in IPR2020-00905, which was filed by Apple in IPR2020-00905 on May 7, 2021.

6. Attached as **Exhibit 13** is a copy of U.S. Patent No. 10,225,479.

7. I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

Executed on October 21, 2022 in Los Angeles, California.

By: /s/ James S. Tsuei
James S. Tsuei